

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

No. 20 Civ. 7311 (LAK)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF
PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT'S
MOTION TO STAY EXECUTION OF THE JUDGMENT PENDING DISPOSITION OF
THE POST-TRIAL MOTIONS

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's memorandum of law in opposition to Defendant's motion to stay execution of the judgment pending disposition of the post-trial motions.

3. Attached hereto as **Exhibit 1** is true and correct copy of excerpts from the official transcript of the trial in this action.

4. **Exhibit 2** is a true and correct copy of PX-147-V, which was entered into evidence during the trial in this action and is being submitted to the Court via CD.

5. Attached hereto as **Exhibit 3** is a true and correct copy of PX-148, which was entered into evidence during the trial in this action.

6. Attached hereto as **Exhibit 4** is a true and correct copy of PX-1, which was entered into evidence during the trial in this action.

7. Attached hereto as **Exhibit 5** is a true and correct copy of PX-2, which was entered into evidence during the trial in this action.

8. Attached hereto as **Exhibit 6** is a true and correct copy of PX-40, which was entered into evidence during the trial in this action.

9. Attached hereto as **Exhibit 7** is a true and correct copy of PX-47, which was entered into evidence during the trial in this action.

10. Attached hereto as **Exhibit 8** is a true and correct copy of PX-59, which was entered into evidence during the trial in this action.

11. Attached hereto as **Exhibit 9** is a true and correct copy of PX-66, which was entered into evidence during the trial in this action.

12. Attached hereto as **Exhibit 10** is a true and correct copy of PX-85, which was entered into evidence during the trial in this action.

13. Attached hereto as **Exhibit 11** is a true and correct copy of PX-118, which was entered into evidence during the trial in this action.

14. Attached hereto as **Exhibit 12** is a true and correct copy of PX-134, which was entered into evidence during the trial in this action.

15. Attached hereto as **Exhibit 13** is a true and correct copy of an excerpt from the official transcript of the trial in the related action, *Carroll v. Trump*, No. 22 Civ. 10016 (S.D.N.Y.).

16. Attached hereto as **Exhibit 14** is a true and correct copy of PX-96, which was entered into evidence during the trial in this action.

17. **Exhibit 15** is a true and correct copy of PX-97, which was entered into evidence during the trial in this action and is being submitted to the Court via CD.

18. Attached hereto as **Exhibit 16** is a true and correct copy of PX-98, which was entered into evidence during the trial in this action.

19. **Exhibit 17** is a true and correct copy of PX-99, which was entered into evidence during the trial in this action and is being submitted to the Court via CD.

20. Attached hereto as **Exhibit 18** is a true and correct copy of PX-100, which was entered into evidence during the trial in this action.

21. Attached hereto as **Exhibit 19** is a true and correct copy of PX-101, which was entered into evidence during the trial in this action.

22. **Exhibit 20** is a true and correct copy of PX-144, which was entered into evidence during the trial in this action and is being submitted to the Court via CD.

23. Attached hereto as **Exhibit 21** is a true and correct copy of PX-144-T, which was entered into evidence during the trial in this action.

24. Attached hereto as **Exhibit 22** is a true and correct copy of PX-146, which was entered into evidence during the trial in this action.

25. **Exhibit 23** is a true and correct copy of PX-149, which was entered into evidence during the trial in this action and is being submitted to the Court via CD.

26. Attached hereto as **Exhibit 24** is a true and correct copy of PX-152, which was entered into evidence during the trial in this action.

27. Attached hereto as **Exhibit 25** is a true and correct copy of PX-160, which was entered into evidence during the trial in this action.

28. **Exhibit 26** is a true and correct copy of PX-164, which was entered into evidence during the trial in this action and is being submitted to the Court via CD.


29. Attached hereto as **Exhibit 27** is a true and correct copy of PX-164-T, which was entered into evidence during the trial in this action.

30. Attached hereto as **Exhibit 28** is a true and correct copy of PX-165, which was entered into evidence during the trial in this action.

31. Attached hereto as **Exhibit 29** is a true and correct copy of PX-166, which was entered into evidence during the trial in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 29, 2024



Roberta A. Kaplan